

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,
HARPERCOLLINS PUBLISHERS LLC,
JOHN WILEY & SONS, INC., and
PENGUIN RANDOM HOUSE LLC

Plaintiffs,

v.

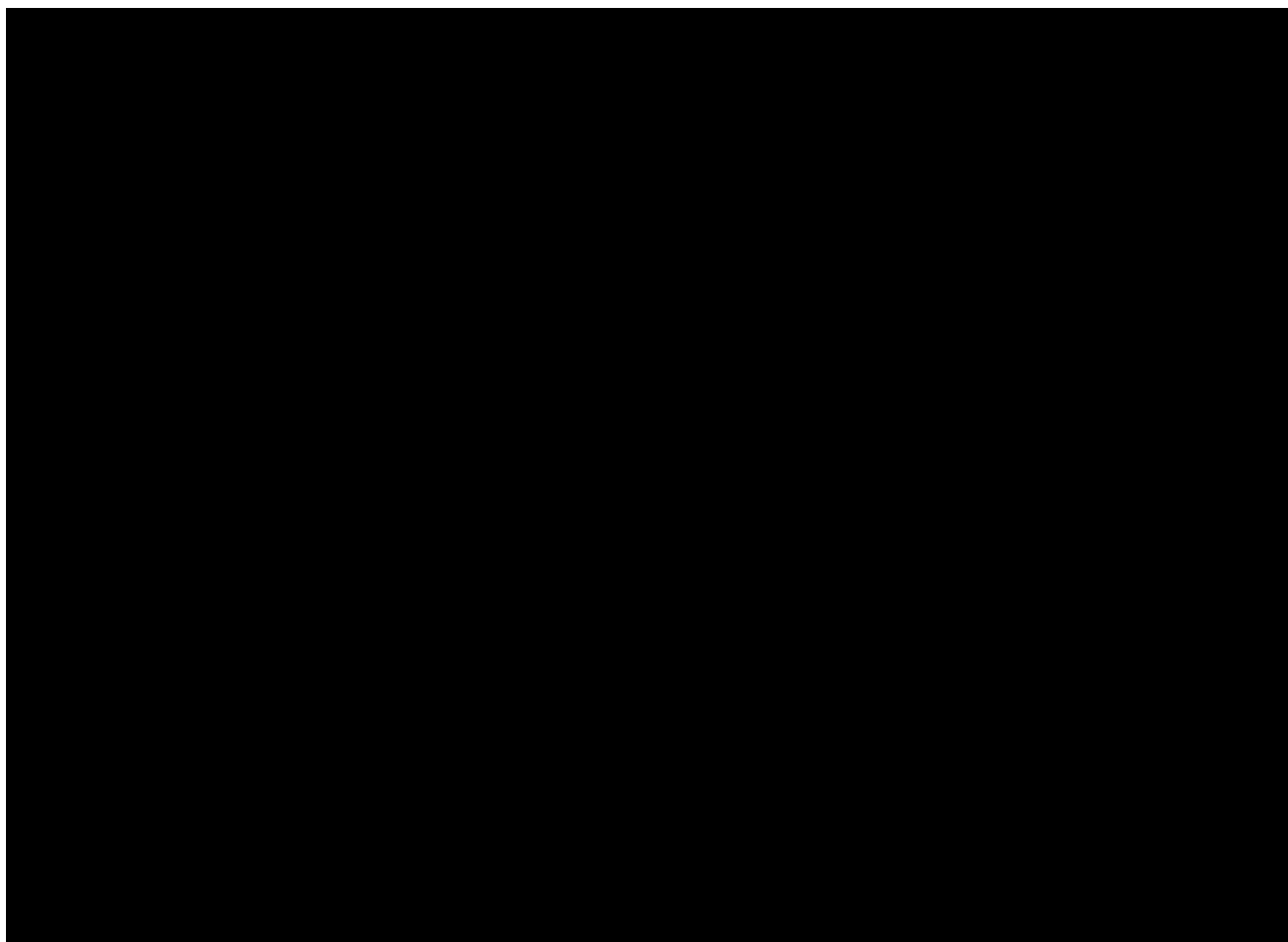
INTERNET ARCHIVE and DOES 1 through
5, inclusive

Defendants.

Case No. 1:20-CV-04160-JGK

DECLARATION OF BRENTON CHENG

CONFIDENTIAL



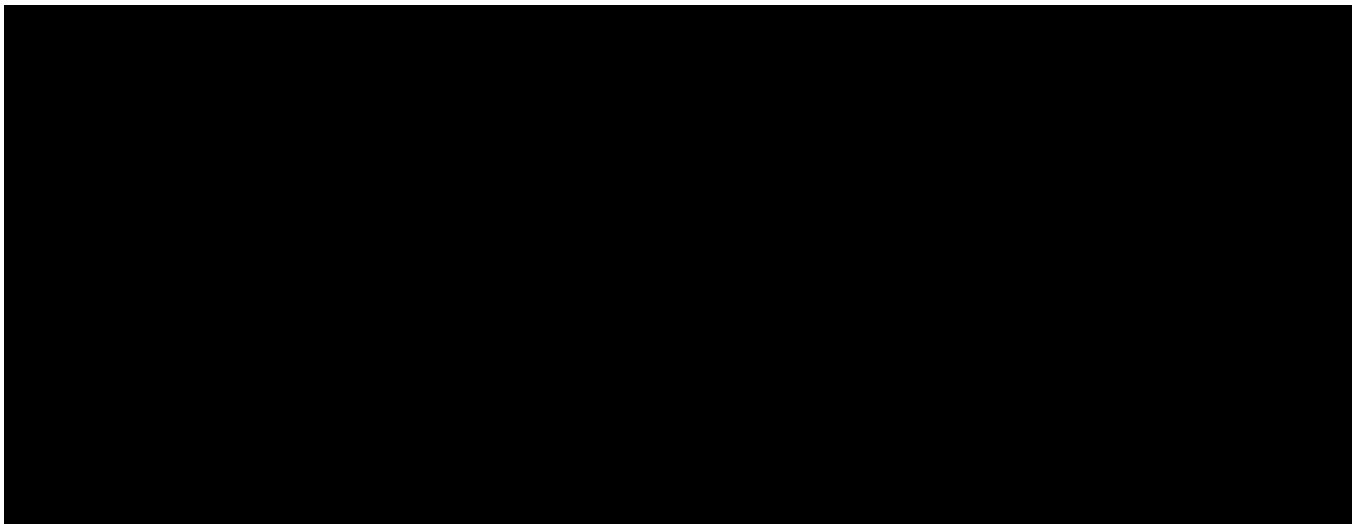
39. The Loan Analytics Database output produced includes data from April 25, 2020 onward. This was around the time the Loan Analytics Database was implemented. The table contains the following columns:

Column		Description
time		the time of the event
identifier		book item identifier
username		username (hashed for privacy)
loan_id		identification of the particular loan
event_type		type of lending-related event
	borrow	initiate 14-day loan
	return	return 14-day loan
	expire	old loan record purged from system by internal maintenance cleanup task runs (the actual expiration time of the loan is reflected in the “extra” column after “until”)
	access_epub	download encrypted ePub token for use with Adobe DRM-compatible reader

	access_pdf	download encrypted PDF token for use with Adobe DRM-compatible reader
	browse	initiate 1-hour loan
	return_browse	return 1-hour loan
	expire_browse	old loan record purged from system by internal maintenance cleanup task (as described above)
	extra	detailed data about loan
	temp_id	temporary ID generated for internal processing

40. The following paragraph is in response to the prompts, “Please confirm that approximately 70,000 books are currently borrowed on a daily basis from Internet Archive under its Controlled Digital Lending program (we are seeking clarification because Kahle’s testimony was unclear as to whether this is 70,000 borrows per day, not 70,000 users borrowing books per day). Please confirm that this figure does not include borrows by users with accounts for people with print disabilities. If it does, please indicate what percentage of the 70,000 borrows per day are by users with accounts for people with print disabilities.”

41. Approximately 70,000 borrow events take place each day across all books. This statistic does include printdisabled loans. Approximately 0.6% of the borrows per day are printdisabled loans. This statistic does not include DAISY downloads, which are not loans.



Attorneys for Plaintiffs

HACHETTE BOOK GROUP, INC., HARPERCOLLINS PUBLISHERS LLC,
JOHN WILEY & SONS, INC., and PENGUIN RANDOM HOUSE LLC

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 14, 2022, at San Francisco, California.

/s/ Aditya V. Kamdar

ADITYA V. KAMDAR